IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

BRENT RAY BREWER,

Petitioner,

S
CIVIL ACTION NO. 2:15-CV-50-J

v.

CAPITAL HABEAS CORPUS

WILLIAM STEPHENS,
Director, Criminal Institutions
Division, Texas Department of
Criminal Justice,

Respondent.

S
Respondent.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY TO RESPONDENT'S ANSWER

Petitioner Brent Ray Brewer respectfully requests an additional 30 days to file his Reply to Respondent's Answer. In support of this motion, Petitioner avers as follows:

On May 5, 2016, Respondent filed his Answer to Petitioner's Amended Petition for Writ of Habeas Corpus. ECF No. 40. Petitioner's reply is currently due on May 31.

Counsel has worked diligently and have begun work on the Reply.

However, additional time is required to complete a professionally adequate briefing. Respondent's Answer raises several arguments, including issues of exhaustion, procedural default, and the effect of state court adjudications which require substantive legal briefing from Petitioner. Counsel requires additional time to adequately research and prepare Petitioner's Reply.

Undersigned counsel has discussed this request with counsel for Respondents, who have indicated they are not opposed.

WHEREFORE, Petitioner respectfully requests an additional thirty (30) days to file his Reply to Respondent's Answer.

Respectfully submitted,

/s/ Philip Alan Wischkaemper PHILIP ALAN WISCHKAEMPER Law Office of Philip Wischkaemper 915 Texas Avenue Lubbock, TX 79401 (806)763-9900 miglit@aol.com Texas State Bar #21802750 /s/ Peter Walker
PETER WALKER
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Federal Community Defender for the
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Texas State Bar #24075445

Dated: May 31, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused the foregoing to be served on the following person by ECF filing:

Erich Dryden
Assistant Attorney General
Office of the Attorney General of Texas
Post Office Box 12548
Austin, Texas 78711-2548

/s/ Peter Walker
Peter Walker

Dated: May 31, 2016

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for Respondent, Assistant Attorney General Erich Dryden, who indicated he does not oppose this motion.

/s/ Peter Walker
Peter Walker

Dated: May 31, 2016